

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LEONARD MAZZOLA,)	CASE NO: 1:19-cv-02519
)	
Plaintiff,)	JUDGE JAMES S. GWIN
)	
v.)	STIPULATED MOTION FOR
)	DEFENDANTS ANTHONY
ANTHONY TOGLIATTI, et al.,)	TOGLIATTI, MICHAEL KILBANE,
)	GREGORY O'BRIEN AND CITY OF
Defendants.)	INDEPENDENCE FOR LEAVE TO
)	PLEAD

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendants Anthony Togliatti, Michael Kilbane, Gregory O'Brien, and the City of Independence respectfully request an additional seven (7) days, until and including February 7, 2020, to answer or otherwise respond to the Plaintiff's First Amended and Supplemental Complaint. Defendants and their defense counsel submit that a seven (7) day extension is necessary to investigate Plaintiff's new claims and additional allegations and to prepare an appropriate pleading. Defendants state that the short extension of time will not delay this case, as the parties have already begun engaging in written discovery and no case schedule has been set at this time.

In addition, Plaintiff's counsel, Ashlie Sletvold, has given her approval for a seven (7) day extension. Defendants thus respectfully request through and including February 7, 2020 to answer or respond to Plaintiff's First Amended and Supplemental Complaint.

Respectfully submitted,

/s/ Ashlie Case Sletvold (per email consent)

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic system. Parties may access this filing through the Court's system.

/s/Maia E. Jerin

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